UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Miami Division

PRESIDENT DONALD J. TRUMP, an individual,

Plaintiff,

v.

BRITISH BROADCASTING CORPORATION a/k/a BBC, BBC STUDIOS DISTRIBUTION LIMITED, and BBC STUDIOS PRODUCTIONS LIMITED,

Defendants.

Case No.

COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff, PRESIDENT DONALD J. TRUMP ("President Trump"), by and through his counsel, brings this action against Defendants, BRITISH BROADCASTING CORPORATION a/k/a BBC (the "BBC"), BBC STUDIOS DISTRIBUTION LIMITED, and BBC STUDIOS PRODUCTIONS LIMITED (collectively, "Defendants"), and states as follows:

INTRODUCTION

1. This action concerns a false, defamatory, deceptive, disparaging, inflammatory, and malicious depiction of President Trump, which was published in a BBC *Panorama* documentary, that was fabricated and aired by the Defendants one week before the 2024 Presidential Election in a brazen attempt to interfere in and influence the Election's outcome to President Trump's detriment.

2. In the BBC *Panorama* documentary titled "*Trump: A Second Chance*" (the "*Panorama* Documentary," or the "Documentary"),[1] which was first broadcast on October 28, 2024, the BBC intentionally and maliciously sought to fully mislead its viewers around the world by splicing together two entirely separate parts of President Trump's speech on January 6, 2021 (the "Speech").[2] The *Panorama* Documentary deliberately omitted another critical part of the Speech in such a manner as to intentionally misrepresent the meaning of what President Trump said.

3. The *Panorama* Documentary falsely depicted President Trump telling supporters: "*We're going to walk down to the Capitol and I'll be there with you. And we fight. We fight like hell and if you don't fight like hell, you're not going to have a country anymore.*" (falsely depicted at 33:53 of the Documentary). President Trump never uttered this sequence of words.

4. This fabricated depiction of President Trump during the Speech was false, deceptive, and defamatory given that President Trump's actual and full remarks during the Speech were (a) "*Now it is up to Congress to confirm this egregious assault on our democracy. And after this, we're going to walk down and I'll be there with you. We're going to walk down, we're going to walk down. Anyone you want but I think right here, we're going to walk down to the Capitol and we're going to cheer on our brave senators and congressman and women, and we're probably not going to be cheering so much for some of them*" (Remarks made on January 6, 2021, 12:12 p.m. Eastern Standard Time, 14:52 into the Speech), and then, much later, (b) "*[B]ut I said 'Something's wrong here, Something's really wrong, can't have happened.' And we fight, we fight like hell, and if you don't fight like hell, you're not going to have a country anymore,*" (Remarks made on January 6, 2021 at 1:07 p.m. Eastern Standard Time, 69:30 into the Speech).

5. Moreover, the BBC purposefully omitted President Trump stating, less than one minute after urging supporters to cheer for their senators and congressmen, "*I know that everyone here will soon be marching over to the Capitol building to peacefully and patriotically make your voices heard*" (Remarks made on January 6, 2021, 12:13 p.m. Eastern Standard Time, 15:48 into the Speech).

6. As set forth in a damning and recently leaked BBC internal whistleblower document, the BBC intentionally used the *Panorama* Documentary to maliciously, falsely, and defamatorily make it appear that President Trump explicitly called for violent action and rioting, and that he "said something he did not,"[3] by splicing together footage from the start of the Speech with a separate quote that he said nearly 55 minutes later, while omitting his statement calling for peace, made less than one minute after his first statement urging supporters to cheer their senators and congressmen at the Capitol. Such distortion of the President's speech by the BBC "materially misled viewers."[4]

7. Moreover, concerns about the *Panorama* Documentary were raised internally before its dissemination, but the BBC ignored those concerns and did not take corrective action.

8. This instance of doctoring—in the form of distortion of meaning and splicing of entirely unrelated word sequences—is part of the BBC's longstanding pattern of manipulating President Trump's speeches and presenting content in a misleading manner in order to defame him, including fabricating calls for violence that he never made. *See e.g.* ¶¶ 55-87, *infra*.

9. The BBC, faced with overwhelming and justifiable outrage on both sides of the Atlantic, has publicly admitted its staggering breach of journalistic ethics, and apologized, but has made no showing of actual remorse for its wrongdoing nor meaningful institutional changes to prevent future journalistic abuses.

10. Accordingly, President Trump brings this action for compensatory and punitive damages for the extensive reputational harm inflicted upon him by the Defendants.

PARTIES

11. Plaintiff, President Trump, is a citizen of the United States and a citizen of the State of Florida. He served as the 45th President of the United States and currently serves as the 47th President of the United States.

12. Defendant, the BBC, is a British corporation established by royal charter and operating under an agreement with the United Kingdom's Secretary of State for Culture, Media, and Sport, with its principal place of business in London, England. The BBC produced and published the *Panorama* Documentary with the other Defendants—its subsidiaries—as well with its production partner, October Films Ltd., and its international distribution partner, Blue Ant Media Corporation.

13. Defendant, BBC Studios Distribution Limited, is a British corporation and a subsidiary of the BBC, which co-produced and published the *Panorama* Documentary.

14. Defendant, BBC Studios Productions Limited, is a British corporation and a subsidiary of the BBC, which co-produced and published the *Panorama* Documentary.

JURISDICTION AND VENUE

15. This Court has jurisdiction over this action pursuant to 28 U.S.C. §1332(a). The parties are completely diverse, as President Trump is a citizen of Florida, while all Defendants are citizens of the United Kingdom, and the amount in controversy exceeds $75,000.00, exclusive of interest and costs.

16. The Court possesses personal jurisdiction over Defendants pursuant to Florida Statute 48.193(2) because Defendants, during the operative period alleged in this Complaint, engaged in substantial and not isolated business activities in Florida, and specifically with its production partner, October Films Ltd., and its international distribution partner, Blue Ant Media Corporation.

17. Defendant, BBC Studios Distribution Limited, is a British corporation and a subsidiary of the BBC, which co-produced and published the *Panorama* Documentary.

18. The BBC also intentionally, purposefully, and continuously transmits news content and other information into Florida, through its multiple websites, to avail itself of the Florida market and its millions of subscribers and broader audience. For example, the BBC offers web pages entitled "Florida – BBC News"[5] and "Florida – BBC Weather,"[6] among others. The BBC also offers web pages specific to cities in Florida.[7]

19. Additionally, the BBC offers subscriptions to individuals in Florida and as a result, has thousands of subscribers in Florida. Any individual in the United States, including Florida, can pay for a subscription to the BBC's content and services.[8]

20. Individuals in the United States, including Florida, also have another option for consuming content produced by the BBC—the *Britbox* by BBC subscription streaming platform.[9] *Britbox* is available in the United States, including in Florida, and has thousands of subscribers in Florida. *Britbox* offers American subscribers, including Floridians, access to a substantial amount of the BBC's original content—including *Panorama*.

21. Accordingly, BBC has engaged, and continues to engage in, substantial and not isolated activity in Florida.

22. In addition, this Court possesses personal jurisdiction over Defendants pursuant to: (a) Florida Statute §48.193(1)(a)(1), because Defendants operate, conduct, engage in, or carry on a business in Florida or have an office or agency in Florida, (b) Florida Statute §48.193(1)(a)(2) because Defendants committed a tortious act in Florida (as stated herein), and (c) Florida Statute §48.193(1)(a)(6) because Defendants caused injury to President Trump within Florida arising out of an act or omission committed by Defendants in Florida, while at or about the time of the injury, products and services provided by Defendants were used or consumed within Florida in the ordinary course of commerce, trade, or use.

23. The *Panorama* Documentary was available to be viewed by citizens of Florida and was, in fact, viewed in Florida by citizens of Florida, notwithstanding the BBC's anticipated, and inaccurate claims that the Documentary was unviewable in the United States due to purported geo-locking. As disgraced, and now former BBC Director General Tim Davie ("Davie") stated in his recent resignation letter: "Despite a hugely competitive market, I am proud that the BBC remains the most trusted news brand *globally*. We have continued to ensure that it is used by almost everyone in the UK as well as hundreds of millions of people globally."[10]

24. The *Panorama* Documentary was available to *Britbox* subscribers in Florida and was in fact viewed by these subscribers through *Britbox* and other means provided by the BBC.

25. In addition to access through various means, including *Britbox*, it is well established that millions of Florida citizens use a virtual private network ("VPN") to view content such as the *Panorama* Documentary, which is aired on foreign streaming platforms like BBC iPlayer.

26. According to vpnMentor, a VPN research firm, VPN usage in Florida has skyrocketed since 2024, with a 51% increase in demand on December 19, 2024, and an over 1,000% increase in VPN usage at the beginning of 2025.[11]

27. Florida streamers have opted to use VPNs to increase their "streaming freedom." Among the most popular streaming services accessed by viewers using a VPN is BBC's online streaming platform, BBC iPlayer.[12]

28. To that end, an article published by *Tom's Guide*, a reputable technology news outlet, revealed that a VPN usage survey showed that approximately 41% of VPN subscribers use the service to stream content, citing BBC iPlayer as an example of what a VPN subscriber could view using a VPN.[13]

29. The *Panorama* Documentary's publicity, coupled with significant increases in VPN usage in Florida since its debut, establishes the immense likelihood that citizens of Florida accessed the Documentary before the BBC had it removed.

30. Articles like those published by Tom's Guide[14] and PureVPN[15]—giving a summary of the *Panorama* Documentary's plot, telling users how to view the Documentary, and going as far as to provide links to VPNs that allow a user to view BBC iPlayer—make it overwhelmingly certain that Floridians accessed the Documentary using a VPN during the time the Documentary was available.

31. Further supporting the fact that Floridians accessed the *Panorama* Documentary through a VPN, *The Guardian* reported that research showed that "65 million people from abroad watch the broadcaster's license-fee funded iPlayer service using proxy servers or virtual private networks."[16]

32. As underscored by the Chairman of the FCC, Brendan Carr, "[t]he BBC has stated that it has a number of partnerships with U.S. broadcasters, including PBS and NPR, to distribute BBC programming here in America."[17]

33. The BBC intentionally distributed and placed the *Panorama* Documentary into the stream of commerce in the United States generally, and in Florida specifically, through various third-party distributors who entered into agreements with Defendants to disseminate the Documentary worldwide. One such agreement was with Blue Ant Media Corporation, a Canadian company engaged by the BBC to distribute the Documentary in North America, including Florida.

34. Blue Ant not only distributed the *Panorama* Documentary in North America through an agreement with the BBC, giving Blue Ant the exclusive international licensing rights to the Documentary,[18] including in Florida, but in an action displaying awareness of wrongdoing, Blue Ant pulled the Documentary from its catalogue on or about November 12, 2025.[19]

35. Blue Ant aggressively advertised its exclusive distribution of the *Panorama* Documentary outside of the United Kingdom, further evidencing the intent of the BBC and its strategic partners to disseminate the Documentary as widely and into as many streams of commerce and channels of distribution as possible, including Florida.[20]

36. Further, and as explained in greater detail below, the BBC elected to publish the *Panorama* Documentary just one week before the 2024 United States Presidential Election with the express intent of interfering with it and trying to undermine President Trump's odds of winning reelection.

37. Moreover, as plainly seen in the very beginning of the *Panorama* Documentary, the BBC's producers and a film crew contracted by the BBC's producers traveled to Florida to film significant portions of the Documentary at and around President Trump's home, Mar-a-Lago, in Palm Beach, Florida, spending substantial amounts of time in Florida and capturing extensive footage on and around the grounds of Mar-a-Lago, and surrounding areas, that the BBC ultimately used in the Documentary.

38. The BBC explicitly instructed and ordered its producers to travel to Florida and to utilize this forum for the purpose of creating the Documentary and defaming President Trump.

39. The *Panorama* Documentary contains extensive evidence and examples of the BBC's producers gathering original footage specifically for use in the Documentary—not using stock footage—at Mar-a-Lago and nearby in the Palm Beach area on April 4, 2023, as well as on other dates. These examples include, but are not limited to: (a) Between 2023 and 2024, the BBC, or its contractors, filmed (i) a wide angle aerial view of Mar-a-Lago taken from a vantage point in the Lake Worth Lagoon (3:57 into the Documentary), (ii) a wide angle aerial view of Mar-a-Lago from a vantage point just north facing the Atlantic Ocean (4:47), (iii) a wide angle shot of the Mar-a-Lago pool and exterior and added a graphic "Trump Residence, Mar-a-Lago Florida" (5:08), and (b) on April 4, 2023, BBC producers and BBC-contracted crew members filmed (i) supporters of President Trump lining the streets as President Trump's motorcade proceeded with President Trump through Palm Beach on the way to Mar-a-Lago (4:03), (ii) Rick Frazier, a supporter of President Trump, in the passenger seat of a vehicle as it followed the motorcade on the approach to Mar-a-Lago (4:09), (iii) The vehicle carrying Frazier as it entered Mar-a-Lago (4:51), (iv) Frazier as he walked in to Mar-a-Lago (5:03), (v) President Trump as he walked in to Mar-a-Lago to deliver a speech (5:11), (vi) Supporters cheering for the President as he prepared to speak inside Mar-a-Lago (5:24), (vii) President Trump as he delivered a speech to supporters inside Mar-a-Lago (5:27), and (viii) Frazier as he interacted with other supporters of President Trump (6:15 and 6:55).

40. The footage gathered by BBC producers and BBC-contracted crew members in Florida was an essential component of the *Panorama* Documentary. Having intentionally dispatched personnel and agents to physically enter Florida for the purpose of gathering this footage, and having extensively availed itself of the benefits of this forum, the BBC is subject to personal jurisdiction in Florida.

41. Venue is proper in this district under 28 U.S.C. § 1391(b)(2) and (b)(3). A substantial part of the events or omissions giving rise to Plaintiff's claims occurred in this District: President Trump is a citizen of Florida who was defamed by the BBC while in Florida, the BBC filmed the *Panorama* Documentary in significant part in Florida, and the BBC, in concert with its strategic partners including October Films Ltd. and Blue Ant Media Corporation, distributed the Documentary into Florida.

FACTUAL ALLEGATIONS

The BBC's Defamatory and Deceptive Depiction of President Trump's Speech in the Panorama Documentary

i. The BBC Splices and Distorts President Trump's Speech

42. The spliced-together version of President Trump's remarks from the Speech that are depicted in the *Panorama* Documentary wrongly made it appear that he said: "*We're going to walk down to the Capitol, and I'll be there with you. And we fight. We fight like hell and if you don't fight like hell, you're not going to have a country anymore.*" (falsely depicted at 33:53 of the Documentary).

43. This fabricated depiction of President Trump during the Speech was false, deceptive, and defamatory, given that President Trump's actual and full remarks during the Speech were (a) "*Now it is up to Congress to confirm this egregious assault on our democracy. And after this, we're going to walk down and I'll be there with you. We're going to walk down, we're going to walk down. Anyone you want but I think right here, we're going to walk down to the Capitol and we're going to cheer on our brave senators and congressman and women and we're probably not going to be cheering so much for some of them.*" (Remarks made on January 6, 2021, 12:12 p.m. Eastern Standard Time, 14:52 into the Speech), and, nearly 55 minutes later, (b) "*[B]ut I said 'Something's wrong here, Something's really wrong, can't have happened.' And we fight, we fight like hell, and if you don't fight like hell, you're not going to have a country anymore.*" (Remarks made on January 6, 2021 at 1:07 p.m. Eastern Standard Time, 69:30 into the Speech).

44. Moreover, to further the BBC's intended, false, malicious, and defamatory message that President Trump fomented violence, which he did not, the BBC intentionally omitted President Trump saying, less than one minute after urging supporters to cheer on their senators and congressmen, "*I know that everyone here will soon be marching over to the Capitol building to peacefully and patriotically make your voices heard.*" (Remarks made on January 6, 2021, 12:13 p.m. Eastern Standard Time, 15:48 into the Speech).

ii. The BBC's Director General and Head of News Resign in Disgrace, and the BBC, Under Fire, Reluctantly Admits Wrongdoing

45. On November 9, 2025, Davie and News CEO Deborah Turness resigned in disgrace over their leading roles in the *Panorama* Documentary.[21]

46. Also on November 9, 2025, President Trump's counsel emailed a letter to Samir Shah (Chairman of the BBC) and Sarah Jones (General Counsel) entitled "Demand to Retract False and Defamatory Statements About The President of the United States of America" demanding retraction of the BBC's false depiction of President Trump, an apology for the false depiction of President Trump, and monetary compensation. ***See* Exhibit A**.

47. By letter dated November 13, 2025, the BBC's counsel indicated that the BBC would apologize to President Trump but, somehow, ignoring the resignations of the BBC's leadership, admitting of wrongdoing, and apology, still attempted to deny intentional wrongdoing and declined to pay damages. **See Exhibit B**.

48. Enclosed with the letter from counsel was a letter of apology from Chairman Shah, which stated, *inter alia*:

> Let me address immediately your speech of 6 January 2021. The way the speech was edited in the documentary gave a misleading impression of what you said. The editing unintentionally created the impression of a single, continuous section of your speech, rather than excerpts from different points in the speech. ***This gave the mistaken impression that you had made a direct call for violent action. That was an editorial error and it should not have happened. I have stated clearly and publicly that the BBC apologises for that error of judgement***. As it was your speech that was edited in a misleading way, and you were the object of that editorial error, I would also like to apologise to you directly for this mistake.

Id. (emphasis added).

49. The BBC then published the following apology on its "Corrections and Clarifications" page, which was also included in the November 13 letter:

> **Panorama – Trump: A Second Chance?**
>
> **28 October 2024**
>
> This programme was reviewed after criticism of how President Donald Trump's 6th January 2021 speech was edited.
>
> During that sequence, we showed excerpts taken from different parts of the speech.
>
> However, we accept that our edit unintentionally created the impression that we were showing a single continuous section of the speech, rather than excerpts from different points in the speech, and ***that this gave the mistaken impression that President Trump had made a direct call for violent action***.
>
> The BBC would like to apologise to President Trump for that ***error of judgment***.
>
> This programme was not scheduled to be re-broadcast and will not be broadcast again in this form on any BBC platforms.[22]

50. Notably, the BBC did not broadcast a correction, apology, or retraction during a broadcast in a comparable manner as the *Panorama* Documentary, or with a comparable audience.

Substantial Evidence of The BBC's Actual Malice

51. Contrary to the BBC's claim that its splicing, manipulation, and distortion of the Speech was an unintentional "editorial error," substantial evidence suggests that this was an intentional and malicious effort to falsely and deceptively portray President Trump as having called for violent action on January 6, 2021.

52. As an initial matter of common sense, it would have been impossible for BBC's journalists and producers to splice together two distinct parts of the Speech from nearly 55 minutes apart *unless* they were acting intentionally. Such a dramatic distortion could never have occurred by accident. Two distinct parts of a speech from nearly 55 minutes apart do not inadvertently become spliced or linked together without effort, knowledge, and purpose. In parallel, by definition, an "an error of judgment," as admitted to by the BBC, is not inadvertent, it includes an intentional act.

53. The BBC's actual malice is further compounded by its prior acts that unequivocally demonstrate that the organization has been anything but fair and impartial when it comes to reporting on President Trump. Substantial evidence demonstrates that before the publication of the *Panorama* Documentary, the BBC and its leadership bore President Trump ill will, wanted him to lose the 2024 Presidential Election, and were dishonest in their coverage of him.

54. The BBC, its journalists, and its producers knew at and prior to the time they published the *Panorama* Documentary that the BBC's depiction of President Trump's Speech was false.

i. The Prescott Memorandum

55. In the early Summer of 2025, Michael Prescott, a journalist who until June 2025 was an independent adviser to the BBC's Editorial Guidelines and Standards Committee ("EGSC"), sent an internal memorandum (the "Memorandum") to the BBC Board "expos[ing] a string of incidents that demonstrate serious bias in the corporation's reporting"; following the leak of the Memorandum, *The Telegraph* published the Memorandum in early November 2025.[23]

56. Prescott highlighted a litany of disturbing misconduct demonstrating how far the BBC has strayed from accepted standards of journalistic integrity, including, but not limited to, the BBC's tampering with President Trump's Speech in the Documentary.[24]

57. Notably, Prescott is nonpartisan, as he wrote in the Memorandum:

> I think it is important to state that I have never been a member of any political party and do not hold any hard and fast views on matters such as American politics or disputes in the Middle East. My views on the BBC's treatment of the subjects covered below do not come with any political agenda. Rather, what motivated me to prepare this note is despair at inaction by the BBC Executive when issues come to light. On no other occasion in my professional life have I witnessed what I did at the BBC with regard to how management dealt with (or failed to deal with) serious recurrent problems.[25]

58. Regarding the *Panorama* Documentary, Prescott wrote:

> I watched the programme and found it to be neither balanced nor impartial—it seemed to be taking a distinctly anti-Trump stance. Critics of the Republican presidential candidate vastly outnumbered those who argued for him. What examinations there was of reasons for Trump's popularity seemed to me insufficient given the overall balance of the programme. Given what I took to be the anti-Trump nature of the programme, I of course assumed there would be a similar, balancing Panorama programme about Democrat presidential candidate Kamala Harris the following week. I remain shocked that there was not.[26]

59. Prescott was not alone in his assessment:

> I raised my concerns at the EGSC and David Grossman [Senior Editorial Adviser to the EGSC] was asked to review the programme. He concluded the main contributors to the documentary were heavily biased against Trump. David sent me further against ten who shared my view that the programme was biased. David said that he had edited in a misleading way, and you were the object of that editorial error, I would also like to apologise to you directly for this mistake.[27]
>
> … Examining the charge that Trump had incited protesters to storm Capitol Hill, it turned out Panorama had spliced together two clips from separate parts of his speech. This created the impression that Trump said something he did not and, in doing so, materially misled viewers.[28]

60. Prescott concluded about the splicing of President Trump's Speech that:

> This was one of the most shocking sets of losses uncovered during my time with the EGSC. If BBC journalists are allowed to edit video in order to make people "say" things they never actually said, then what value are the Corporation's guidelines, why should the BBC be trusted, and where will this all end?[29]

ii. The 2022 BBC Newsnight Distortion Demonstrating that the Panorama Documentary Splice is Part of a Defamatory Pattern by the BBC of Falsely Depicting President Trump Through Doctored Footage

61. As further revealed by *The Telegraph*, the BBC also aired similarly doctored footage of President Trump's Speech on a 2022 episode of *BBC Newsnight*.[30]

62. In the doctored Speech clip aired by *BBC Newsnight*, President Trump is falsely, maliciously, and defamatorily depicted as saying: "*We're going to cheer on our brave senators and congressman and women, and we fight, we fight like hell.*"[31]

63. What President Trump really said was: "*[A]nd we're going to cheer on our brave senators and congressman and women, and we're probably not going to be cheering so much for some of them.*"[32] (Remarks made on January 6, 2021, 12:12 p.m. Eastern Standard Time, 14:52 into the Speech).

64. As *The Telegraph* reported: "Spliced footage of the speech, which aired in an episode in 2022, made it appear that Mr. Trump was encouraging his supporters to riot. The edit was much like a version aired in a *Panorama* documentary broadcast last year."[33]

65. As further reported by *The Telegraph*: "Like *Panorama*, the *Newsnight* edit made it look as if the US President had urged supporters to walk to the Capitol building with him to 'fight like hell' by linking statements made nearly an hour apart in his speech."[34] The harm caused by this doctoring was exacerbated by the BBC intentionally omitting President Trump stating, only one minute after urging supporters to cheer on their senators and congressmen, "*I know that everyone here will soon be marching over to the Capitol building to peacefully and patriotically make your voices heard.*" (Remarks made on January 6, 2021, 12:13 p.m. Eastern Standard Time, 15:48 into the Speech).

66. Immediately after the *BBC Newsnight* episode aired, Mick Mulvaney, former Acting White House Chief of Staff, and David Chaudoir, former award-nominated graphic designer for *BBC Newsnight* from 2022-24, both individually voiced their concerns regarding the misleading and malicious way *BBC Newsnight* edited the clip to distort reality.[35]

67. Mr. Chaudoir specifically told *The Telegraph* that he was present for discussions about the *BBC Newsnight* clip the day after it was published, wherein *BBC Newsnight* production team members dismissed any ethical concerns about the *BBC Newsnight* clip.[36]

68. Mr. Mulvaney expressed his concern on-air while being interviewed on *BBC Newsnight*, stating:

> Your video actually spliced together the presentation. He said: "We're going to go down and we're going to cheer on our senators and our house members" and then it actually goes on to say "And some of them we might not be able to' and that line about 'and we fight and fight like hell' is actually later in the speech yet your video makes it look like those two things came together. [37]

69. The malicious nature of the spliced and edited clip is further underscored by former BBC legal affairs correspondent Clive Coleman's statements in response to the *Panorama* Documentary, stating:

> I really struggle to understand how we got to this place . . . The first lesson almost you're taught as a broadcast journalist is that you do not join two bits of footage together from different times in a way that will make the audience think that it is one piece of footage.[38]

iii. The 2024 BBC News Shooting Hoax Further Demonstrating that the Panorama Documentary Doctoring is Part of an Defamatory Pattern by the BBC of Falsely Depicting President Trump Calling for Violence

70. As also revealed by *The Telegraph*, the BBC "has admitted misleading viewers by claiming that Donald Trump called for one of his leading critics to be shot in the face."[39]

71. This admission by the BBC, regarding three instances of false statements about President Trump supposedly calling for violence against a political opponent, none of which occurred, is contained in the now-public Memorandum, and yet the BBC has still failed to issue a public correction.[40]

72. As described by *The Telegraph*:

> In the days before the US presidential election in November last year, a presenter on BBC World News America said that Mr. Trump "appeared to suggest Liz Cheney should face a firing squad for her stance on foreign policy."
>
> On the BBC News Channel, another presenter asked his guest: "He [President Trump] is out there on the campaign trail saying he wants people to shoot Liz Cheney in the face . . . Is that the sort of thing women react well to?"
>
> Speaking on the Six O'Clock News the same night, Sarah Smith, the BBC's North America editor, said Mr. Trump had been "ratcheting up the violent rhetoric."
>
> She added: "In the latest spat, Donald Trump has been accused of being petty, vindictive and a wannabe tyrant because he suggested that one of his political opponents should face guns, have them trained on her face."[41]

73. All these statements by BBC presenters were false.

74. "In fact, Mr. Trump had accused Ms. Cheney of being a 'radical war hawk' who wanted to send troops to war while she remained in the safety of Washington DC, saying: 'Let's put her with a rifle standing there with nine barrels shooting at her face. OK? Let's see how she feels about it.'"[42]

75. This false, defamatory, and malicious coverage of President Trump, broadcast in the same time period as the release of the *Panorama* Documentary, was consistent with the BBC's *modus operandi*, defaming President Trump by fabricating calls for violence allegedly issued by him, that he never actually made.

iv. The Panorama Documentary Was Intentionally One-Sided and Inflammatory, demonstrating that the Doctoring of President Trump's Speech Was Intentional and Part of the BBC's Defamatory Pattern

76. The lack of any effort by the BBC to publish content even remotely resembling objective journalism, or to maintain even a slight semblance of objectivity in the *Panorama* Documentary, demonstrates that the BBC had no regard for the truth about President Trump, and that the doctoring of his Speech was not inadvertent, but instead was an intentional component of the BBC's effort to craft as one-sided an impression and narrative against President Trump as possible.

77. Indeed, by any measure, including the overwhelming ratio of anti-Trump versus pro-Trump commentators in the *Panorama* Documentary, the exceptionally high percentage of time granted to these negative voices in the Documentary versus the positive voices, and the inflammatory content of the negative remarks, all coupled with the BBC's historical unfairness to the President, it is apparent that the BBC fabricated the Documentary to damage President Trump. Doctoring his Speech was consistent with, and part of, the BBC's *modus operandi* of negatively covering President Trump without any pretense of objectivity.

78. The BBC's aggressively anti-Trump stance is reflected straightaway in the opening scene of the *Panorama* Documentary's introduction, which runs for almost three minutes and begins with noted anti-Trump commentator Rick Wilson—who has written two books criticizing President Trump, *Everything Trump Touches Dies* (2018) and *Running Against the Devil: A Plot to Save America From Trump-and Democrats from Themselves* (2020), and has called the President "the devil" and a "cult leader"—declaring, to the backdrop of ominous cinematic music reaching a dramatic crescendo: "I'm the leading anthropologist of Donald Trump in the, in the world, probably, I've thought about him and studied him more than probably anybody else, and I hate him. I hate what he is, and what he does."

79. Seconds later, Wilson states of President Trump: "When you let the monster escape, it will come back, it is a rule of every damn horror movie in history."

80. Former Clinton Secretary of Labor and current Berkeley Professor Robert Reich, another vocal critic of President Trump, then offers: "Once you've unleashed this anger, this hate, into the blood of America, well, it's very very difficult to stop it."

81. A greater majority of the verbal commentary in the *Panorama* Documentary features negative assertions about President Trump by twelve individuals known to be hostile to the President, all of whom are presented as having some form of relevant expertise and authority about the subject matter presented. Moreover, an overwhelming majority of the overall Documentary, including the non-interview segments depicting political and historical events from recent years, presents President Trump in a negative light.

82. Further demonstrating the BBC's malice and intent to interfere with the 2024 Presidential Election, the *Panorama* Documentary, after lingering at length on the events of January 6, 2021, cuts to a clip from the Democratic National Convention on August 22, 2024, showing Kamala Harris taking the stage with a news anchor breathlessly exclaiming in the background: "And here she is, Kamala Harris. It's hard to describe just how electric the mood is here right now."

83. Toward the end of the *Panorama* Documentary, Reich shockingly compares President Trump to "Adolf Hitler," which rises to defamation itself, while Democrat Congressman Jared Huffman refers to the President as a "cult leader," also a defamatory statement.

84. Others then join Reich in delivering hyperbolic warnings about President Trump and the supposedly catastrophic consequences that would ensue if President Trump were to emerge victorious.

85. "The degree to which his pessimism and darkness has infected half this country terrifies me," adds Wilson. "There is no ideology in the Republican party except pain, they want vengeance," he continues.

86. Berkeley Political Science Professor Steven Fish asserts "There's a reason why Xi Jinping and Vladimir Putin and Kim Jong Un and all these despots all over the world are rooting so hard for Trump because what Trump does is he seems to discredit democracy in the land of its stronghold, in the strongest democracy in the world, Trump seems to be proof that democracy doesn't work."

87. Boston College History Professor Heather Cox Richardson offers, "this is the time when we either choose authoritarianism or democracy, and if we choose authoritarianism, there will be no turning back, so I think we better get this one right."

88. Reich delivers a closing remark to punctuate the BBC's parade of bias: "Wish us luck, by us, I mean the United States."

v. Prominent Voices Condemn the BBC and Confirm the BBC's Longstanding Pattern of Actual Malice Against President Trump

89. The BBC is so institutionally biased against President Trump and so devoid of self-awareness that, in response to the above letter from President Trump's counsel (**Exhibit A**), it published a baseless and meritless article questioning the merits of any lawsuit that the President might bring against the BBC.[43]

90. No less an authority than the United Kingdom's former Prime Minister, Liz Truss, discussed this bias, the need to hold the BBC accountable, and the BBC's pattern of actual malice.[44]

91. Remarked Truss: "[The BBC] is a huge problem. They've lied, they've cheated, they've fiddled with footage, especially in the case of President Trump, but also covering up what's happening in Britain whether it's mass migration, whether it's our economic problems, they are always biased towards the left . . . ." She was also asked whether the BBC's tepid apology was sufficient, and responded: "No I don't, because they keep doing it again and again. They have painted a completely false picture of President Trump in Britain over a number of years, they've done the same thing about conservatives in our country . . . ." Lamenting the BBC's lost status as a "paragon" of journalism, she remarked that the BBC's "fake news" has caused immense harm to the public for a long time.[45]

92. Caroline Dinenage, head of the House of Commons' Culture, Media, and Sport Committee said that Members of Parliament need assurances that the BBC was "taking decisive steps to uphold the corporation's reputation for integrity and public trust." She further remarked: "The Corporation must set the benchmark for accurate and fair reporting, especially in a media landscape where it is all too easy to find news presented in a less than impartial way."[45]

93. Conservative Party leader and Member of Parliament Kemi Badenoch said that the distortion of the Speech by the *Panorama* Documentary was "absolutely shocking," adding: "That is fake news, actually putting different things together to make something look different from what it actually was." She continued: "And I do think heads should roll. Whoever it was who did that should be sacked, that's what Tim Davie should be doing, identifying who put out misinformation, and sacking them." Badenoch added: "The public need to be able to trust our public broadcaster . . . They should not be telling us things that are not true. This is a corporation that needs to hold itself to the highest standards, and that means that when we see people doing the wrong thing, they should be punished, they should be sacked."[46]

94. Lisa Nandy, Secretary of State for Culture, Media and Sport of the United Kingdom, has similarly expressed concern, stating: "there is a real concern, which I share, that political appointments to the board of the BBC damaged confidence and trust in the BBC's impartiality."[47]

95. FCC Chairman, Brendan Carr, in a letter addressed to Davie, Paula Kerger, (President and CEO of PBS), and Katherine Maher (CEO of NPR), strongly stated:

> As you know, the BBC was recently caught intentionally distorting a speech that President Trump gave in January of 2021. It did so by splicing together one portion of the speech with an entirely separate portion of the speech that came 54 minutes later. In doing so, the BBC program depicts President Trump voicing a sentence that, in fact, he never uttered. That would appear to meet the very definition of publishing a materially false and damaging statement.[48]

96. Carr continued, highlighting the findings of the Memorandum:

> Indeed, there has now been widespread condemnation of the BBC's decision. A former independent external advisor to the BBC's Editorial Guidelines and Standards Committee, Michael Prescott, told the BBC that its decision "created the impression that President Trump had made a direct call for violent action" and "misled viewers." Likewise, the Prescott Report states that the BBC program was "neither balanced nor impartial—it seemed to be taking a distinctly anti-Trump stance." In sum, it was a 'distortion of the day's events," the Prescott Report continued.[49]

CLAIMS FOR RELIEF

COUNT I – DEFAMATION *PER SE*

104. Plaintiff, President Donald J. Trump, realleges his allegations contained in paragraphs 1 through 103 as if set forth fully below.

105. The following false, deceptive, malicious, and defamatory statements and depictions of and about President Trump, were, intentionally, with actual malice, and without privilege, published in the *Panorama* Documentary to millions of people in the State of Florida and in this District, and elsewhere, by all Defendants, and were defamatory and false, and injured President Trump in his profession, occupation, and trade, thus constituting defamation *per se*:

(a) The spliced-together version of President Trump's remarks from the Speech that are depicted in the *Panorama* Documentary made it seem that he stated: "*We're going to walk down to the Capitol and I'll be there with you. And we fight. We fight like hell and if you don't fight like hell, you're not going to have a country anymore.*" (falsely depicted at 33:53 of the Documentary).

(b) This fabricated depiction of President Trump during the Speech was false and defamatory given that President Trump's actual and full remarks during the Speech were (i) "*Now it is up to Congress to confirm this egregious assault on our democracy. And after this, we're going to walk down and I'll be there with you. We're going to walk down, we're going to walk down. Anyone you want but I think right here, we're going to walk down to the Capitol and we're going to cheer on our brave senators and congressman and women and we're probably not going to be cheering so much for some of them.*" (Remarks made on January 6, 2021, 12:12 p.m. Eastern Standard Time, 14:52 into the Speech), and, nearly 55 minutes later, (ii) "*[B]ut I said 'Something's wrong here, Something's really wrong, can't have happened.' And we fight, we fight like hell, and if you don't fight like hell, you're not going to have a country anymore.*" (Remarks made on January 6, 2021, 1:07 p.m. Eastern Standard Time, 69:30 into the Speech).

(c) Moreover, to further the BBC's intended, false, malicious, and defamatory message and impression that President Trump fomented violence, the BBC intentionally omitted President Trump stating, only one minute after urging supporters to cheer on their senators and congressmen, "*I know that everyone here will soon be marching over to the Capitol building to peacefully and patriotically make your voices heard.*" (Remarks made on January 6, 2021, 12:13 p.m. Eastern Standard Time, 15:48 into the Speech).

106. Defendants possessed information and had access to information which showed that their statements about, and representation and depiction of President Trump were false.

107. Defendants had no factual basis for this false depiction of President Trump.

108. Defendants' deceptive and defamatory distortion, doctoring, manipulation, and splicing damaged President Trump in his occupation, damaged his professional reputation, and portrayed him as engaging in supposed calls for rioting and violence that he never actually made.

109. The *Panorama* Documentary was not a continuation of a prior broadcast. Instead, it was the result of a separate and distinct decision by Defendants to maliciously disseminate false statements about President Trump in a new medium.

110. As pled *supra*, Defendants knew that their portrayal of the Speech in the *Panorama* Documentary was false, malicious, and defamatory.

111. Defendants' actual malice in publishing the *Panorama* Documentary is evidenced by their intentional splicing and distorting two entirely separate sentences made by President Trump during the Speech nearly 55 minutes apart, while omitting his statement calling for peace made less than one minute after his first statement urging supports to cheer on their senators and congressmen at the Capitol.

112. As a proximate result of the maliciously false and defamatory *per se* publication of a statement and depiction to third parties by Defendants, President Trump has been damaged.

113. Because Defendants' defamatory statements constitute intentional acts which were made with actual malice towards President Trump, he seeks an award of punitive damages.

WHEREFORE, Plaintiff, PRESIDENT DONALD J. TRUMP, demands judgment against Defendants, BRITISH BROADCASTING CORPORATION a/k/a BBC, BBC STUDIOS DISTRIBUTION LIMITED, and BBC STUDIOS PRODUCTIONS LIMITED, for damages in an amount not less than $5,000,000,000, as well as interest, costs, punitive damages, attorney's fees, and such other relief as this Court may deem just and proper.

COUNT II – VIOLATION OF FLORIDA DECEPTIVE AND UNFAIR TRADE PRACTICES ACT

114. Plaintiff, President Donald J. Trump, realleges his allegations contained in paragraphs 1 through 103 as if set forth fully below.

115. In addition, this action is brought for violation of the Florida Deceptive and Unfair Trade Practices Act as codified in Fla. Stat. § 501.201 *et seq.* ("FDUTPA").

116. Defendants are eng